

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

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MAR 13 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Local Number Portability	)	CC Docket No. 95-116
Phase II Implementation	)	

**PETITION FOR WAIVER**

Teleport Communications Group Inc. ("TCG") hereby requests a waiver of the Phase II implementation schedule for deployment of local number portability ("LNP") in the Miami, Fort Lauderdale, San Diego, Phoenix, and Seattle MSAs.<sup>1</sup> The Phase II implementation date established by the Commission for implementing such number portability is May 15, 1998. TCG requests a waiver of the Commission's deadline for the following reasons:

**I. PHOENIX AND SEATTLE MSAs**

TCG is a member of the limited liability corporation group of carriers both for the West Coast and Western regions and has participated in the process of evaluating RFP responses for local number portability administrators for the Phoenix and Seattle MSAs and in choosing a vendor. TCG is dependent on the vendor chosen to provide a stable platform to support local number portability. As TCG reported in its recent Petition for Waiver regarding the Phase I implementation date, the vendor that had been chosen for these regions, Perot Systems, was

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1. See 47 C.F.R. § 52.31(d) and Appendix.

unable to provide that stable platform, which "significantly affected" local number portability deployment in the Southeast, Western, and West Coast regions.<sup>2</sup>

Therefore, it was necessary to select, and make arrangements with, a new vendor.

The Western and West Coast LLC Carrier Groups each selected a new vendor, Lockheed Martin, to provide the required platform. TCG has been informed that Lockheed plans to have the Number Portability Administration Center/Service Management System ("NPAC/SMS") ready for a field trial in both the Western and West Coast regions by May 11, 1998. TCG remains in regular contact with Lockheed regarding LNP implementation. However, no date has been set yet for the LNP activation date, which will require coordination among all the participating carriers. TCG will inform the Commission the date when it expects to be able to implement LNP in the Phoenix and Seattle MSAs once the respective dates are known.

## **II. MIAMI AND FORT LAUDERDALE MSAs**

For the same reasons stated above, the previous vendor was recently replaced by Lockheed. TCG has been informed that Lockheed plans to have the NPAC/SMS for the Southeast region prepared for a field trial in June or July, 1998. TCG remains in regular contact with Lockheed regarding LNP implementation;

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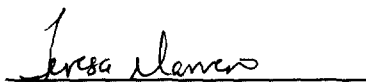
2. See Letter from Alan Hasselwander, Chairman, North American Numbering Council, to A. Richard Metzger, Jr., Chief, Common Carrier Bureau, FCC (dated January 21, 1998); see also TCG Petition for Waiver (Phase I Implementation), CC Docket No. 95-116 (filed February 27, 1998).

however, no firm date has been set for testing. Similarly, no date has been set for LNP activation. TCG will inform the Commission the date when it expects to be able to implement LNP in Miami and Fort Lauderdale MSAs once the respective dates are known.

Based upon the foregoing circumstances beyond its control, TCG requests a waiver of the May 15, 1998 deadline for LNP implementation in the Phoenix, Seattle, Miami, and Fort Lauderdale MSAs.

Respectfully submitted,

TELEPORT COMMUNICATIONS GROUP INC.



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Dated: March 13, 1998

CERTIFICATE OF SERVICE

I, Dottie E. Holman, hereby certifies that on this 13th day of March, 1998, have caused a copy of the foregoing PETITION FOR WAIVER to be served via hand delivery, upon the persons listed below:

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